

KAREN A. CONNOLLY, LTD.

Karen A. Connolly  
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146  
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

1 KAREN A. CONNOLLY  
2 **KAREN A. CONNOLLY, LTD.**  
3 6600 W. Charleston Blvd., Ste. 124  
4 Las Vegas, NV 89146  
5 Telephone: (702) 678-6700  
6 Facsimile: (702) 678-6767  
7 E-Mail: [advocate@kconnollylawyers.com](mailto:advocate@kconnollylawyers.com)  
8 *Attorney for Defendant, Russell Cates*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 RUSSELL CATES,

12 Defendant.

CASE NO.: 2:20-mj-519-VCF

**RUSSELL CATES' UNOPPOSED**  
**MOTION TO CONDUCT A PRE-PLEA**  
**PRESENTENCING INVESTIGATION**  
**REPORT AND PROPOSED ORDER**

13 COMES NOW the Defendant, RUSSELL CATES, by and through his attorney of record,  
14 KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and hereby moves  
15 this Honorable Court to order that a Pre-Plea Pre-Sentence Investigation Report be prepared by the  
16 United States Department of Parole and Probation to determine Defendant's criminal history.  
17 Defendant has a number of priors. Counsel for defendant and Assistant United States Attorney  
18 JIM W. FANG, have been engaged in negotiation discussions. Defendant's criminal history score  
19 needs to be clarified to enable counsel to properly assess his exposure relative to any proposed plea  
20 agreement, specifically whether or not CATES is eligible for a Armed Career Criminal or Career  
21 Offender enhancement. In order to help facilitate a resolution to this matter, in the interests of  
22 judicial economy, it is respectfully requested that the United States Department of Parole and  
23 Probation be directed to prepare a pre-plea presentence investigation report as soon as possible.

24 DATED this 1<sup>st</sup> day of March, 2021.

25 /s/ Karen A. Connolly  
26 KAREN A. CONNOLLY  
27 Nevada Bar No. 4240  
28 6600 W. Charleston Blvd. Suite 124  
Las Vegas, Nevada 89102-1846  
Attorney for Defendant, Russell Cates

1 KAREN A. CONNOLLY  
2 **KAREN A. CONNOLLY, LTD.**  
3 6600 W. Charleston Blvd., Ste. 124  
4 Las Vegas, NV 89146  
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6 Facsimile: (702) 678-6767  
7 E-Mail: [advocate@kconnollylawyers.com](mailto:advocate@kconnollylawyers.com)  
8 *Attorney for Defendant, Russell Cates*

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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**  
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 RUSSEL CATES,

18 Defendant.  
19

CASE NO.: 2:20-mj-519-VCF

**ORDER**

20  
21 IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence  
22 Investigation Report on Defendant RUSSELL CATES.  
23

24 DATED this the 11th day of March, 2021.  
25

26  
27   
28 U.S. MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

It is hereby certified that service of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT was made through the Court's electronic filing and notice system (CM/ECF) which will send a notice of electronic filing to all parties via electronic filing.

Dated this 1<sup>st</sup> day of March 2021.

/s/ Shaeley Foster  
Employee of Karen A. Connolly, LTD.

KAREN A. CONNOLLY, LTD.  
Karen A. Connolly  
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Telephone: (702) 678-6700 Facsimile: (702) 678-6767